

# **Exhibit L**

11/11/2003 15:45

NO. 947 000

**Docketed****UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ING BANK N.V.,

Plaintiff,

-against-

J.P. MORGAN CHASE BANK,  
DELOITTE & TOUCHE, LLP, LANCE  
K. POULSEN, THOMAS G. MENDELL,  
HAROLD W. POTE and ERIC R.  
WILKINSON,

Defendants.

03 Civ. 7396 (LAK)

**STIPULATION AND ORDER  
TEMPORARILY STAYING ALL  
PROCEEDINGS IN THIS CASE**

It is hereby stipulated and agreed to, by and between undersigned counsel for the parties hereto, that:

1. In July 2003, defendants JPMorgan Chase Bank (sued herein as J.P. Morgan Chase Bank), Deloitte & Touche LLP, Harold W. Pote, Eric R. Wilkinson and Thomas G. Mendell (collectively "Defendants"), as well as several of the defendants in numerous other actions pending in various federal district courts, filed a motion before the Judicial Panel on Multidistrict Litigation to consolidate seven actions and transfer them to the United States District Court for the Southern District of Ohio. Defendants subsequently filed several Notices of Related Action requesting the transfer of this case and three others as "tag-alongs" to that original motion (collectively "Motion to Consolidate"). Plaintiff opposed the consolidation and transfer of this case, and, alternatively, requested that the actions subject to the Motion to Consolidate be consolidated before this Court. The MDL Panel held a hearing on the Motion to Consolidate on October 9, 2003.

2. On October 10, 2003 and October 28, 2003, the parties filed joint stipulations in this case extending the time for certain Defendants to answer, move or otherwise respond to the Complaint to and including December 1, 2003.

3. After more recent discussions among the parties, the parties respectfully request that the Court enter a temporary stay of all proceedings as follows, which is consistent with similar stays pending in other cases that are the subject of the Motion to Consolidate.:

4. If the MDL Panel has not decided the pending Motion to Consolidate by December 8, 2003, the stay in this matter will be lifted only to allow the Defendants to answer, move or otherwise respond to the complaint in this action according to the following schedule:

- a. Answers, motions, or other responses to the Complaint shall be served upon Plaintiff no later than December 31, 2003;
- b. Any responses to any motions to dismiss shall be served upon Defendants no later than March 1, 2004;
- c. Any reply briefs shall be served upon Plaintiff no later than March 31, 2004.

5. If the MDL Panel denies the pending Motion to Consolidate on or before December 8, 2003, the stay in this matter will be lifted and the following briefing schedule will apply:

- a. Answers, motions, or other responses to the Complaint shall be served upon Plaintiff no later than December 8, 2003 or 21 days from the date of the Order of the MDL Panel (whichever is later);

- b. Any responses to any motions to dismiss shall be served upon Defendants no later than 60 days after such motion to dismiss is served upon Plaintiff;
- c. Any reply briefs shall be served upon Plaintiff no later than thirty days after Plaintiff's opposition is served upon Defendants.


5. By entering into this stipulation, Defendants agree not to request from this Court a further extension of time to answer, move or otherwise respond to the Complaint. However, each party reserves the right to seek modifications to the above schedule in the event this case is transferred as part of an MDL proceeding and agrees that this stipulation does not affect or prejudice any relief, including a stay of this action, sought in any other court, including the stay requested by Messrs. Pote., Mendell and Wilkinson that is currently pending before the United States Bankruptcy Court for the Southern District of Ohio.

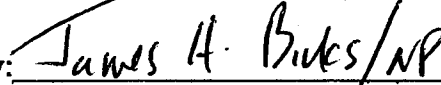
Dated: November 11, 2003

November 11, 2003

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Dated: November 11, 2003

November 11, 2003

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SO ORDERED, this \_\_\_\_\_ day of November, 2003:

\_\_\_\_\_  
Honorable Lewis A. Kaplan  
United States District Judge